

Turkey

Overview of CbC reporting requirements

Turkey has implemented the BEPS Action 13 (CbC reporting) minimum standard with four recommendations for improvement.

First reporting fiscal year: Commencing on or after 1 January 2019

Consolidated group revenue threshold: EUR 750 million

Filing deadline: 12 months following the end of the reporting fiscal year

Local filing required: Yes

Surrogate parent entity filing permitted: Yes

First review of the domestic legal framework: 2019/2020

Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	None.
Exchange of information framework	It is recommended that Turkey take steps to have the necessary processes and written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework.
Appropriate use	It is recommended that Turkey take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information.

The domestic legal and administrative framework

Turkey's 2019/2020 peer report recommended that Turkey take steps to amend its legislation or otherwise bring the definition of Constituent Entity into line with the standard. Turkey has issued a Ministerial Communiqué making this amendment and the recommendation is removed.¹

Turkey's 2019/2020 peer report recommended that Turkey take steps to clarify that the annual consolidated group revenue threshold calculation rule applies in line with the OECD guidance on currency fluctuations in respect of an MNE Group whose Ultimate Parent Entity is located in a jurisdiction other than Turkey. Turkey has issued a Ministerial Communiqué making this clarification and the recommendation is removed.

The exchange of information framework

Turkey's 2017/2018 peer review recommended that Turkey take steps to have qualifying competent authority agreements in effect with jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions and with which Turkey has an international exchange of information agreement in effect that allows for the automatic exchange of tax information. Agreements are now in effect and this recommendation is removed.

It is recommended that Turkey take steps to have the necessary processes and written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework. This recommendation remains in place since the 2018/2019 peer report.

Appropriate use of CbC reports

It is recommended that Turkey take steps to ensure that the appropriate use conditions are met ahead of the first exchanges of information. This remains in place since the 2017/2018 peer review.

Notes

¹ https://www.gib.gov.tr/sites/default/files/fileadmin/user_upload/Cumhurbaskani_Karari/2151_KV_CK.pdf
<https://www.gib.gov.tr/gibmevzuat>



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